

J Christopher Jorgensen
Nevada Bar No. 5382
Matthew Tsai
Nevada Bar No. 14290
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996
Tel: (702) 949-8200
Email: cjorgensen@lrrc.com
Email: mtsai@lrrc.com

*Attorneys for Defendant Synchrony Bank identified herein as
Care Credit, LLC and Synchrony Financing, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LERNER & ROE INJURY ATTORNEYS, a
Nevada Corporation,

Plaintiffs,

v.

ARQUIDEMES COSME; UNITED STATES OF
AMERICA DEPARTMENT OF TREASURY,
INTERNAL REVENUE SERVICE; UNITED
STATES OF AMERICA DEPARTMENT OF
VETERANS AFFAIRS, VETERANS HEALTH
ADMINISTRATION; CARE CREDIT LLC;
SYNCHRONY LENDING, INC.; RAUSCH
STURM, ISRAEL, ENERSON & HORNIK
LLP; DOES I-V; and ROE CORPORATIONS I-
V,

Defendants.

CASE NO. 2:20-cv-00465-APG-EJY

**JOINT MOTION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
CARE CREDIT LLC AND SYNCHRONY
LENDING, INC TO FILE AND SERVE A
RESPONSE TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

Plaintiff Lerner & Rowe Injury Attorneys ("Plaintiff") and Defendants CareCredit LLC and Synchrony Lending, Inc. ("Synchrony Defendants"), (together, the "Parties") hereby jointly move for an extension, by and through their attorneys of record, as set forth below:

WHEREAS, Plaintiff filed a Complaint on March 5, 2020;

WHEREAS, Synchrony Defendants received the Complaint on March 11, 2020;

WHEREAS, this extension is requested in good faith so as to give the Parties additional time to investigate the claims in this matter and pursue possible settlement;

1 WHEREBY, the Synchrony Defendants requested and Plaintiff agreed to extend the
2 Synchrony Defendants' time to file and serve a response to Plaintiff's Complaint in Interpleader
3 from April 1, 2020, to May 1, 2020;

4 For the foregoing reasons, the Parties request this Court grant their Joint Motion to extend
5 Synchrony's time to file and serve a response to Plaintiff's Complaint to May 1, 2020.

6
7 DATED: April 1, 2020

LERNER & ROWE

8 By: /s/ Randolph L. Westbrook, III
9 Randolph L. Westbrook (SBN 12893)
10 4795 South Durango Drive
11 Las Vegas, NV 89147
12 *Attorney for Plaintiff*

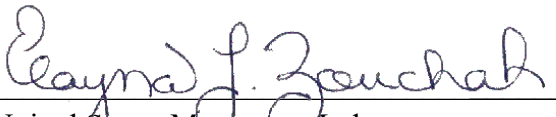
13
14 DATED: April 1, 2020

LEWIS ROCA ROTHBERGER CHRISTIE, LLP

15 By /s/ J Christopher Jorgensen
16 J Christopher Jorgensen (SBN 5382)
17 Matthew Tsai (SBN 14290)
18 3993 Howard Hughes Pkwy, Suite 600
19 Las Vegas, NV 89169-5996
20 *Attorney for Defendants Care Credit LLC*
21 *and Synchrony Financing, Inc.*

22 **ORDER**

23 **IT IS SO ORDERED.**

24 
25 Dayna J. Zouchal
26 United States Magistrate Judge

27 DATED: April 2, 2020
28